

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

**BARBIE BASSETT**

**PLAINTIFF**

**VS.**

**CAUSE NO. 3:23-cv-03154-DPJ-ASH**

**GRAY MEDIA GROUP, INC.,  
d/b/a WLBT-TV**

**DEFENDANT**

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**JOINT MOTION FOR PROTECTIVE ORDER**

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Pursuant to FED. R. CIV. P. 26(c)(1), Barbie Bassett and Gray Media Group, Inc. (the “Parties”) request the entry of a proposed Agreed Protective Order. The Parties state as follows:

1. Documents and things will be produced during the course of discovery that contain certain information and documentation that the Parties treat as confidential, such as proprietary and confidential commercial information and private information of employees which may have been previously maintained by Defendant Gary Media Group, Inc. in a confidential manner.
2. A protective order is needed to preserve the confidentiality of these documents and things to prevent their disclosure to third parties not involved in this litigation.
3. The Agreed Protective Order, which is being submitted via email concurrently with the filing of this motion pursuant to L. U. CIV. R. 7(b)(2)(F), will maintain the confidentiality of that information and allow the parties to proceed with discovery in this case.

For the reasons set forth herein, the Parties respectfully request the Court approve and enter the Agreed Protective Order.

RESPECTFULLY SUBMITTED, this the 25th day of September, 2024.

BARBIE BASSETT, Plaintiff

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ATTORNEYS FOR PLAINTIFF

### **CERTIFICATE OF SERVICE**

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing with the Clerk of the Court, utilizing the federal court electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

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DATED, this the 25th day of September, 2024.

/s/ Yance A. Falkner  
Yance A. Falkner